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July 15, 2021

Honorable Robert D. Drain
United States Bankruptcy Judge
U.S. Bankruptcy Court for the
Southern District of New York
300 Quarropas Street
White Plains, NY 10601-4140

Re: The Official Committee of Unsecured Creditors vs.
(i) McKesson Corp. (Adv. Pro. 17-08264);
(ii) McKesson Pharmacy Systems, LLC (Adv. Pro. 17-08265); and
(iii) McKesson Specialty Care Distribution Corp. (Adv. Pro. 17-08266)
(collectively, the "Adversary Proceedings")

Dear Judge Drain:

The Plaintiff and the McKesson defendants continue to make substantial progress in completing discovery in each of the Adversary Proceedings. Among other things, after counsel were fully vaccinated, the parties took, or soon will have taken, approximately ten in-person depositions of witnesses located in various states throughout the United States.

We had hoped to have concluded all discovery on time, but we were unable to do so. The parties agree that additional time is necessary in order to be prepared to try these cases efficiently. As a result, the Plaintiff and the McKesson defendants respectfully submit this joint request for one final extension of the discovery cutoff from Friday, July 16, 2021 to Friday, August 27, 2021, solely for the purpose of submitting rebuttal expert reports, responding to discovery that has already been served, and conducting a small number of depositions that the parties have already noticed or agreed to schedule. The parties also intend to use the time to try to resolve as many factual issues as possible through meetings of their respective accountants, which we expect to begin next week. There are some unresolved issues with respect to outstanding discovery requests and witness testimony, but the parties believe that they will be able to resolve all or most of those issues consensually.

After the close of discovery, the parties anticipate that a pre-motion conference pursuant

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to Local Rule 7056-1 will be sought. Accordingly, the parties jointly request that the Court schedule a pre-motion conference rather than a pre-trial conference on a date of the Court's choosing following the close of discovery, or extend the time between the close of discovery and the conference. The parties make this request so that they will not be required to designate witnesses, agree on a joint exhibit book, and otherwise work on being ready for trial immediately after the close of discovery given that the trial will likely be postponed so that motions can be filed and decided.

Based on the foregoing, the parties respectfully request that the enclosed proposed amended scheduling and pre-trial order be entered by the Court.

Very truly yours,

BUCHALTER
A Professional Corporation

/s/ Jeffrey K. Garfinkle

cc: Richard K. Milin, Esq.
Tracy Klestadt, Esq.